

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:)	Case No.: 21-22706-CMB
)	
James R. Wilhoit, II)	Chapter 13
Debtor(s))	
)	Claim. No.: 6
James R. Wilhoit, II)	
Movant(s))	
)	
v.)	
)	
Nationstar Mortgage LLC and)	
Ronda J. Winnecour, Trustee)	
Respondent)	

DECLARATION

I, Albert G. Reese Jr., Esquire, attorney for the above-referenced Debtor, hereby submit this formal written Declaration that the existing Chapter 13 Plan is sufficient to fund the plan with the modified debt for the following reason:

Pursuant to Nationstar Mortgage LLC's Notice of Mortgage Payment Change dated September 10, 2024, the Debtor's current escrow payment for account number ending in **6042** is **\$236.15**. The new escrow payment is **\$321.51**. The new total mortgage payment is **\$540.88** effective October 1, 2024. The Debtor will make the any escrow shortage payment in addition to his regular monthly Chapter 13 plan payment..

Dated: **October 28, 2024**

Respectfully submitted by:
/s/ James R. Wilhoit, II
James R. Wilhoit, II

Dated: **October 28, 2024**

Respectfully submitted by:
/s/ Albert G. Reese, Jr., Esquire
Albert G. Reese, Jr., Esquire
Attorney for Debtor
PA ID #93813
640 Rodi Road, 2nd Floor, Suite 2
Pittsburgh, PA 15235
(412) 241-1697
(412) 241-1687(fax)
areese8897@aol.com